

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RE: Verna A Stinson-Ford,
Debtor

BK NO. 25-10147-amc

The Bank of New York Mellon
Movant

Chapter 13

Confirmation Hearing Date: 4/16/2025

vs.

Verna A Stinson-Ford,
Scott F. Waterman,
Trustee
Respondents

OBJECTION OF THE BANK OF NEW YORK MELLON TO CHAPTER 13 PLAN

The Bank of New York Mellon (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 Plan and asserts in support of its Objection as follows:

1. Creditor has filed a proof of claim with pre-petition arrears in the amount of \$13,005.64.
2. Debtor's Plan underestimates the prepetition arrearage amount owed to Creditor as \$10,538.00.
3. Confirmation of the Plan should be denied until Debtor amends the Plan to properly treat Creditor's claim.
4. Creditor reserves the right to raise any failure of Debtor to timely make all payments under the Plan or required by the Plan, if at the time of the confirmation hearing that appears to be the case.
5. Confirmation of the Plan is not feasible and at best premature.
6. Accordingly, Confirmation of the Plan should be denied.

Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: March 31, 2025

/s/Brian Nicholas

Brian Nicholas

Attorney for Creditor

McCalla Raymer Leibert Pierce, LLP 325

Chestnut Street, Suite 725 Philadelphia,

Pennsylvania, 19106 8489994640

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CERTIFICATION OF SERVICE

I, the undersigned, hereby certify that the foregoing Objection to Confirmation was served by first class mail, postage pre-paid, upon the parties listed below on **March 31, 2025**.

Chapter 13 Trustee

Scott F. Waterman [Chapter 13]
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
VIA ECF

Attorney for Debtor

Jeanne Marie Cella
Jeanne Marie Cella and Associates LLC
221 N Olive St
Media, PA 19063
VIA ECF

Debtor

Verna A Stinson-Ford
46 Broadway Ave
Aston, PA 19014
VIA U.S. MAIL

Dated: March 31, 2025

By: /s/Brian Nicholas

Brian Nicholas
Attorney for Movant